



**STATE OF ALABAMA**

PUBLIC SERVICE COMMISSION  
P.O. BOX 304260  
MONTGOMERY, ALABAMA 36130

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TWINKLE ANDRESS CAVANAUGH, PRESIDENT

JOHN A. GARNER, EXECUTIVE

DIRECTOR

JEREMY H. ODEN, ASSOCIATE COMMISSIONER

CHRIS "CHIP" BEEKER, JR., ASSOCIATE COMMISSIONER

September 27, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9050 Junction Drive  
Annapolis Junction, MD 20701

DOCKET FILE COPY ORIGINAL

RE: CC Docket No. 96-45/WC Docket No. 14-58, Annual State Certification of Support  
for Eligible Telecommunications Carriers Pursuant to 47 C.F.R. § 54.314

Ms. Dortch:

Pursuant to the requirements of 47 C.F.R. § 54.314, the Alabama Public Service Commission hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that the telecommunications carriers included in this letter are eligible to receive federal high-cost support for the program years cited.

The Alabama Public Service Commission certifies for the carriers listed all federal high-cost support provided to such carriers within Alabama was used in the preceding calendar year (2018) and will be used in the coming calendar year (2020) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Company Name	Study Area Code
See Appendix "A"	See Appendix "A"

Sincerely,

John A. Garner  
Executive Director

(334) 242-5200

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List ABCDE

## APPENDIX "A"

Ardmore Telephone Company, Inc. (290280)  
BellSouth Telecommunications, LLC d/b/a AT&T Alabama (255181)  
Blountsville Telephone LLC (250282)  
Brindlee Mountain Telephone LLC (250283)  
Butler Telephone Company, Inc. (250284)  
Castleberry Telephone Company, Inc. (250285)  
Century of Alabama, LLC d/b/a CenturyLink (259788 and 259789)  
Farmers Telecommunications Cooperative, Inc. (250290)  
Frontier Communications of Alabama, LLC (250306)  
Frontier Communications of Lamar County, LLC (250301)  
Frontier Communications of the South, LLC (250318)  
Consolidated Communications of Florida Company (210291)  
Gulf Telephone Company (250298)  
Hayneville Telephone Company, Inc. (250299)  
Hopper Telecommunications LLC (250300)  
Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone (220371)  
Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone (250295)  
Millry Telephone Company, Inc. (250304)  
Mon-Cre Telephone Cooperative, Inc. (250305)  
Moundville Telephone Company, Inc. (250307)  
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Ragland Telephone Company, Inc. (250316)  
Roanoke Telephone Company, Inc. (250317)  
Union Springs Telephone Company, Inc. (250322)  
Valley Telephone Company, LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone (220324)  
Windstream Alabama, LLC (250302)  
Hayneville Fiber Transport, Inc., d/b/a Camellia Communications (259008)  
Troy Cablevision, Inc. (259025)

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JOHN A. GARNER, EXECUTIVE DIRECTOR

<b>IN RE: IMPLEMENTATION OF THE UNIVERSAL SERVICE REQUIREMENTS IN THE TELECOMMUNICATIONS ACT OF 1996, SECTION 254 AND 47 C.F.R § 54.314</b>	<b>DOCKET 25980  CERTIFICATION OF CARRIERS RECEIVING FEDERAL UNIVERSAL SERVICE FUND HIGH COST SUPPORT FOR 2020</b>
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**FURTHER REPORT AND ORDER**

**BY THE COMMISSION:**

**I. Introduction and Background**

By Order entered in this cause on September 27, 2018, Eligible Telecommunications Carriers ("ETCs") in Alabama, that are subject to the Alabama Public Service Commission's ("Commission") jurisdiction, were ordered to file their proposals for utilization of projected 2020 federal high-cost universal service support (the "2020 high-cost support") by no later than July 10, 2018. The Commission's Order afforded interested parties the latitude to submit comments in response to those filings no later than July 24, 2018, with any reply comments due on or before July 31, 2018.

The Federal Communication Commission ("FCC") price cap carriers indicate their plan and intent is to make broadband available to eligible living units in the census blocks identified by the FCC pursuant to requirements and benchmarks. The price cap carriers in Alabama are:

1. CenturyTel of Alabama, LLC d/b/a CenturyLink (Southern), CenturyTel of Alabama, LLC d/b/a CenturyLink (Northern) and Gulf Telephone Company LLC d/b/a CenturyLink (collectively “CenturyLink”);
2. BellSouth Telecommunications LLC d/b/a AT&T Alabama (“AT&T”);
3. Windstream Alabama, LLC (“Windstream”);
4. Consolidated Communications of Florida Company (“Consolidated”)
5. Frontier Communications of Alabama, LLC, Frontier Communications of Lamar County, LLC and Frontier Communications of the South, LLC (collectively “Frontier”).

The Alabama price cap carrier certifications are attached in Appendix “B”.

Beginning with the FCC’s November 18, 2011, Connect America Fund (“CAF”) Order, the FCC made significant changes to federal universal service support, primarily by redirecting the funds from the support of voice service in rural high-cost areas to the support of broadband capable networks in specific unserved or underserved areas.<sup>1</sup> This transition has taken place in stages, with different implementation schedules for price-cap and rate-of-return carriers. As part of the Transformation Order,<sup>2</sup> the FCC also created uniform annual compliance and reporting rules for all FCC high-cost support recipients. For price cap carriers, the transition has culminated in the offer and acceptance of Connect America Phase II (“CAF II”) funding.<sup>3</sup> Under CAF II, the FCC made specific statewide funding offers to each carrier for the deployment of broadband networks capable of at least 10 Mbps download/1 Mbps upload broadband speed in certain eligible areas in each state.<sup>4</sup> With the acceptance of the CAF II state-level commitment in 2015, the

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<sup>1</sup> *Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011 (the “Connect America Fund Order” or “CAF-ICC Order”).

<sup>2</sup> *USF/ICC Transformation and Rule Clarification and Correction Order*, WC Docket Nos. 10-90, 12-63; CC Docket No. 01-92; DA-13-564, rel. Mar. 27, 2013 (the “Transition Order”).

<sup>3</sup> *Order In the Matter of Connect America Fund*, WC Docket No. 10-90, rel. May 16, 2013 (the “CAF II Order”).

<sup>4</sup> ETCs receiving CAF II dollars continue to have the obligation to provide voice service in areas where they receive the CAF II support.

previous federal high-cost funding (CAF I frozen support) ceased for price cap carriers in Alabama. The public interest obligations, annual reporting requirements and compliance and recordkeeping requirements associated with CAF II support are detailed in the FCC CAF II Orders and codified in Part 54 of the FCC's rules. Specifically, for CAF II, the compliance requirements focus on year-end location milestones beginning in 2017, within which carriers must have enabled 10/1 Mbps broadband speeds to a specified number of locations (i.e., 40% of the locations by end-of-year 2017, 60% by 2018, 80% by 2019, and 100% by 2020<sup>5</sup>). The FCC adopted these detailed reporting mechanisms for filings with the FCC, Universal Service Administrative Company ("USAC") and state commissions to facilitate regulatory oversight and to ensure that the requirements for using the funds are met.

In the *April 2014 Connect America Order/FNPRM*,<sup>6</sup> the FCC proposed a voluntary election by rate-of-return ("ROR") ETCs to receive model-based support in lieu of the existing (legacy) high-cost support mechanisms. On August 3, 2016, the FCC announced the offer of high-cost support and deployment obligations for each ROR ETC in a state based on the final version of the Alternative Connect America Cost Model ("A-CAM"). The A-CAM is a voluntary path under which rate-of-return carriers may elect model-based support for a term of 10 years in exchange for meeting defined build-out obligations.<sup>7</sup> In its September 27, 2016 Order, the Commission required that ROR carriers electing to receive high-cost support pursuant to the A-CAM report their election to the Commission's Utility Services Division ("USD") of their final acceptance of such funding. Millry Telephone Company ("Millry"); Brindlee Mountain Telephone, LLC, Blountsville

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<sup>5</sup> In addition, the rules allow for shortfalls in locations in 2020 to be remedied in 2021.

<sup>6</sup> *Connect America Fund et al.; Omnibus Order and Further Notice of Proposed Rulemaking*, WC Docket Nos. 10-90, 14-58, 07-135; WT Docket No. 10-208; CC Docket No. 01-92; and FCC 14-54, rel. Apr. 23, 2014.

<sup>7</sup> *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., para. 4 (2016) (*March 2016 Connect America Order and/or FNPRM*).

Telephone, LLC, Otelco Telephone, LLC, Hopper Telephone, LLC, (collectively “Otelco”); Butler Telephone Company, Peoples Telephone Company, Oakman Telephone Company (collectively “TDS”); National Telephone Company, Roanoke Telephone Company (collectively “TEC”) informed the Commission’s USD of acceptance to receive A-CAM funding. The remaining ROR carriers are subject to the existing (legacy) ROR support and mechanism reforms and receive Broadband Loop Support (“BLS”).<sup>8</sup> The FCC ROR carriers in Alabama certifications are attached in Appendix “C”

The non-incumbent Local Exchange Carriers (Hayneville Fiber Transport, Inc. and Troy Cablevision, Inc.) continue to receive frozen high cost support. Carriers will continue to receive high cost support in an amount equal to its CAF Phase I support until the first month that the winner of any competitive bidding process receives support under CAF II.<sup>9</sup> The FCC non-incumbent Local Exchange Carriers receiving high-cost support in Alabama certifications are attached in Appendix “D”.

On various dates in 2019, all Alabama ETCs identified individually in Appendix “A” hereto submitted certifications regarding their planned utilization of 2020 high-cost support.

## **II. CenturyLink’s Planned Utilization of 2020 High-Cost Support**

On August 27, 2015, CenturyLink notified the Commission that it had accepted the FCC’s offer of funding to enable access to broadband service for 48,865 locations in Alabama, encompassed by both CenturyTel of Alabama, LLC’s and Gulf Telephone Company LLC’s service areas

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<sup>8</sup> *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., para. 80 (2016) (*March 2016 Connect America Order and/or FNPRM*).

<sup>9</sup> *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., para. 187 (2014) (*June 2016 Connect America Order and/or FNPRM*).

In accordance with its acceptance of the CAF II funding, by filing dated July 1, 2019, CenturyLink submitted a proposal for utilizing its projected 2020 high-cost support.

### **III. AT&T's Planned Utilization of 2020 High-Cost Support**

Based on AT&T's acceptance of CAF II support and associated requirements on August 27, 2015, AT&T's, indicated in filing dated July 12, 2019, that AT&T is currently working to deploy broadband to 80% of the 66,766 CAF II living units in AT&T's service territory by the end of 2019. In its filing of July 10, 2018, AT&T indicated that this effort to achieve the 80% requirement will continue in 2019 with an additional 20% deployment in 2020. This will be accomplished primarily, if not completely, via a fixed wireless platform.

### **IV. Windstream Alabama, LLC Planned Utilization of 2020 High-Cost Support**

Windstream Alabama, LLC ("Windstream") Alabama, accepted CAF II funding on August 5, 2015. Windstream's certification was filed with the Commission on June 18, 2019, with an affidavit certifying its compliance with, and eligibility under, the FCC rules applicable to USF high-cost support, plus stated that it plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 80% milestone of enabling at least 1511 of the 1,889 locations to be served within the eligible areas with broadband capable of providing 10 Mbps download/1Mbps upload by December 31, 2019. Windstream will utilize the CAF II support in 2020 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment and enabling of broadband service in CAF II eligible areas. Windstream's September 26, 2019 filing states that it has already provided broadband to 2,737 locations, which is in excess of the 1,889 locations identified by the FCC required by the CAF II program. In

addition, Windstream has provided 100% of these locations with higher speeds than required minimum speed required by the CAF II program.

#### **VI. Consolidated Communications of Florida Company Planned Utilization of 2020 High-Cost Support**

Consolidated Communications of Florida Company (“Consolidated”) accepted CAF II funding on August 18, 2015. On July 5, 2018, it filed a certification of its compliance with, and eligibility under, the FCC rules applicable to USF high-cost support and stated that it plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 80% milestone of enabling at least 960 locations within the eligible areas with broadband capable of providing 10 Mbps download/1Mbps upload by December 31, 2019. On July 29, 2019, Consolidated filed an affidavit stating that it will continue to use the high cost funding pursuant to the FCC rules and regulations. Consolidated will utilize the CAF II support in 2020 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment and enabling of broadband service in CAF II to an additional 20% eligible areas by December 31, 2020.

#### **VII. The Frontier Companies Planned Utilization of 2020 High-Cost Support**

Frontier Communications of Alabama, LLC, Frontier Communications of Lamar County, LLC and Frontier Communications of the South, LLC (collectively “Frontier”) accepted CAF II funding on June 15, 2015. On May 3, 2018, Frontier filed a certification of its compliance with, and eligibility under, the FCC rules applicable to USF high-cost support and stated that it plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 80% milestone of enabling at least 4,425 broadband locations by December 31, 2019. On May 7, 2019 Frontier filed certification that it will continue to use the high cost funding pursuant to the FCC rules and



regulations. Frontier will utilize the CAF II support in 2020 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment and enabling of broadband service in CAF II eligible areas to an additional. 20% by December 31, 2020.

### **VIII. Staff findings**

The FCC has implemented extensive reporting requirements for recipients of the CAF II, ROR A-CAM, ROR legacy, and non-incumbent local exchange carrier funds. These requirements include the annual submission of detailed information on the FCC Form 481, including an Outage Report; Unfilled Requests for Service; Complaints per 1000 Connections; Certifications; Current Price Offerings; Company Identification; Tribal Outreach; Areas with No Terrestrial Backhaul (if applicable); and Additional Voice Rate Data. Further, ETCs receiving high cost funding are required to report quarterly/annually to USAC the specific location and deployment obligation obtained. Further, the Commission's USD, in years prior to 2018, has received the reporting requirements from the ETCs receiving high-cost funding. By order released July 7, 2017, under WC Docket No. 10-90 and WC Docket No. 14-58 ("2017 FCC Order"), the FCC streamlined the annual reporting requirements for ETC's that receive high-cost universal service support by eliminating the requirement that ETC's submit a duplicate copy of the FCC Form 481 filing to state commissions contingent upon USAC providing the capability for state commissions to access the documentation via an online, electronic portal. Based on this, the Commission issued an order in this docket to amend its October 25, 2017 Order to remove the requirement that ETC's submit a duplicate copy of their FCC Form 481 to the Commission's USD effective beginning with the July annual filing deadline and applicable annual FCC Form 481 filings thereafter. Staff believes the Commission will be able to adequately assess high-cost ETC's compliance with the

requirements based on a review of its federal reports, as well as location and deployment obligations data submitted to the FCC and USAC. Staff can follow up to address any questions or concerns through data requests or meetings with the company. Subject to these reporting and disclosure requirements, the Commission approves the high cost ETC's 2020 high-cost proposals.

### **IX. Discussion and Conclusions**

We hereby approve the proposals submitted in this cause by FCC designated price cap carriers, ROR carriers, and the non-Incumbent Local Exchange Carrier ETCs governing their expenditure of federal high-cost universal service support during the year 2020. We will certify to the FCC that those plans are compliant with the provisions of §254(e) of the Telecommunications Act of 1996 and 47 C.F.R. § 54.

We specifically note, however, that our approval herein is contingent upon the staff's continued monitoring of the implementation of the aforementioned plans. The Commission specifically reserves the right to conduct any proceedings that may be necessary to determine if the funding is being used for the intended purpose.

In accordance with 47 C.F.R. § 54, any recipient of CAF II, ROR, or non-incumbent local exchange carrier recipient of high-cost funding shall file the information required by the Form 481 with the FCC. The Commission will continue to verify the certifications of the ETCs receiving high cost funding pursuant to the applicable FCC rules.

**IT IS, THEREFORE, ORDERED BY THE COMMISSION,** That the CAF II, ROR, and non-incumbent local exchange carrier recipients of high-cost funding, attached hereto as Appendix "A", 2019 filings for high-cost support for which they are eligible during the year 2020, are hereby approved as stipulated herein and certified as compliant with the provisions of §254(e) of the

Telecommunications Act of 1996 and 47 C.F.R. § 54. The approval granted herein is, however, contingent on the recipients of high-cost funding compliance with all provisions of this Order.

**IT IS FURTHER ORDERED BY THE COMMISSION,** That the approval and certifications addressed herein shall be further contingent upon satisfactory results from the Commission's ongoing review as set forth in this Order. To that end, any recipient of high-cost funding shall file the information required by the Form 481 with the FCC.

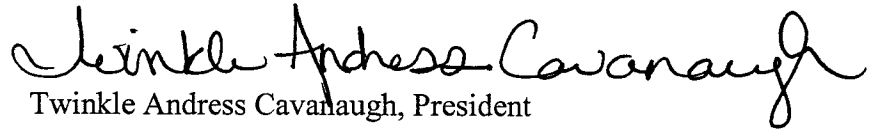
**IT IS FURTHER ORDERED BY THE COMMISSION,** That any recipient of high-cost funding shall file their proposals for the utilization of the funding for which they are eligible in the year 2020 no later than July 10, 2020. Interested parties may submit comments in response to the foregoing filings no later than July 24, 2020. Reply comments will be considered by the Commission if received on or before July 31, 2020.

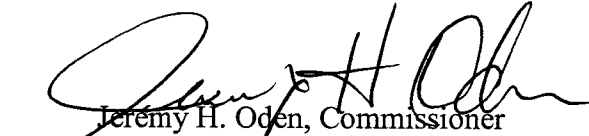
**IT IS FURTHER ORDERED BY THE COMMISSION,** That jurisdiction in this cause is hereby retained for the issuance of any further order or orders as may appear to be just and reasonable in the premises.


IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DATED at Montgomery, Alabama, this 27<sup>th</sup> day of September 2019.

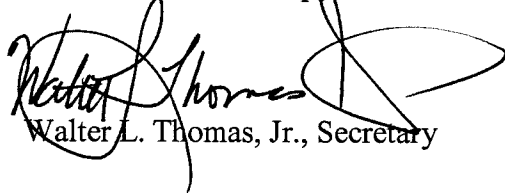
ALABAMA PUBLIC SERVICE COMMISSION

  
Twinkle Andress Cavanaugh, President

  
Jeremy H. Oden, Commissioner

  
Chris "Chip" Beeker, Jr., Commissioner

ATTEST: A True Copy

  
Walter L. Thomas, Jr., Secretary

**APPENDIX "A"**

Ardmore Telephone Company, Inc. (290280)  
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**APPENDIX "A"**

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Troy Cablevision, Inc. (259025)



CenturyLink™

100 N. Union Street, Suite 828  
Montgomery, AL 36104

July 1, 2019

**VIA HAND DELIVERY**

Mr. Walter Thomas, Secretary  
Alabama Public Service Commission  
RSA Union Building, Room 850  
100 North Union Street  
Montgomery, Alabama 36104

Re: Docket 25980 - APSC Certification of Eligibility to Receive  
High Cost Support Pursuant to 47 CFR §54.314  
CenturyLink's 2020 Plans for Utilization of Connect America Fund Phase II Support

Dear Mr. Thomas:

On August 27, 2015, CenturyLink announced that it would accept the Federal Communications Commission's ("FCC's") offer of Connect America Fund Phase II ("CAF II") support and the commitment to provide access to broadband service for at least 48,865 households and businesses in designated rural census blocks across CenturyLink's Alabama service area. CenturyLink notified the Commission of its acceptance of the FCC's CAF II support on August 27, 2015.

With the acceptance of CAF II support, CenturyLink's 2020 plans for utilization of federal universal service support are based on the requirements of the CAF II program. As established in the Commission's September 2, 2015 Order in the above referenced docket, CenturyLink provides in Attachment A information on its 2020 plans for the utilization of the CAF II support to achieve the requirements of CAF II in Alabama.

Because the CAF II program is based on a state level commitment, the information provided on Attachment A represents a single plan for CenturyLink's Alabama ETCs including Gulf Telephone Company LLC d/b/a CenturyLink, CenturyTel of Alabama, LLC d/b/a CenturyLink (Southern), and CenturyTel of Alabama, LLC d/b/a CenturyLink (Northern).

Please do not hesitate to contact me at (334) 256-468-1161 or via email at [Brent.Beal@CenturyLink.com](mailto:Brent.Beal@CenturyLink.com) should you have any questions regarding this matter.

Sincerely,

/s/ Brent Beal  
Brent Beal  
Government Affairs Director

Attachment

**2020 CAF II Support Utilization Plans for  
Gulf Telephone Company LLC d/b/a CenturyLink, Study Area Code 250298  
CenturyTel of Alabama, LLC d/b/a CenturyLink (Southern), Study Area Code 259788  
CenturyTel of Alabama, LLC d/b/a CenturyLink (Northern), Study Area Code 259789**

As established in the Commission's September 2, 2015 Order in Docket 25980, CenturyLink provides the following information on its 2020 plans for the utilization of the CAF II support to achieve the requirements of CAF II in Alabama.

- CenturyLink accepted the FCC's state-level offer for CAF II support in Alabama. As a result, CenturyLink is committed to enabling 48,865 locations with broadband speeds of 10 Mbps download/1 Mbps upload by the end of 2020.
- As of December 31, 2018, CenturyLink has enabled 30,391 locations within the eligible areas with broadband capable of providing 10 Mbps download/1 Mbps upload.
- The CAF II broadband enablement obligation has periodic federal benchmark milestones with the first milestone set at 40% of total supported locations by December 31, 2017. The remaining enablement milestones are 60% of total supported locations by 2018, 80% of total supported locations by 2019, and 100% of total supported locations by 2020.
- In 2019, CenturyLink plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 75% milestone of enabling at least 36,000 cumulative locations within the eligible areas with broadband capable of providing 10 Mbps download/1 Mbps upload by December 31, 2019.
- In 2020 and 2021 if needed, CenturyLink plans to continue to utilize its CAF II support with the goal of meeting or exceeding the 100% milestone of enabling at least 48,865 cumulative locations within the eligible areas with broadband capable of providing 10 Mbps download/1 Mbps upload by December 31, 2020.
- CenturyLink will utilize the CAF II support in 2020 for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment, and enabling broadband service in CAF II eligible areas.





**THOMAS B. ALEXANDER**  
Assistant Vice President – Senior Legal Counsel  
AT&T Alabama  
AT&T Mississippi

**AT&T Services, Inc.**  
Legal Department  
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Atlanta, GA 30308

T: 404-893-7943  
F: 404-927-3636  
thomas.b.alexander@att.com  
Website: www.att.com

July 12, 2019

*Via Electronic Filing and Overnight Mail*

Honorable Walter Thomas, Secretary  
Alabama Public Service Commission  
100 N. Union Street-8<sup>th</sup> Floor  
Montgomery, AL 36104

**RE: Implementation of the Universal Service Requirements of Section 254 of the  
Telecommunications Act of 1996-(Certification of Non-Rural Carriers Receiving  
Federal High-Cost Support)  
Docket No. 25980**

Dear Mr. Thomas:

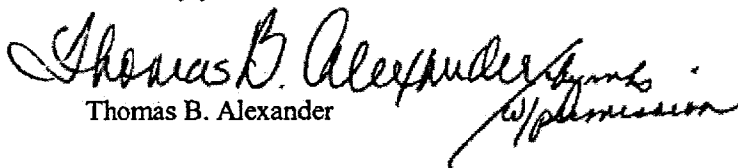
Pursuant to the Alabama Public Service Commission's Order entered in this case on October 25, 2017, Eligible Telecommunications Carriers ("ETCs") in Alabama were ordered to file their proposals for utilization of projected 2019 federal high-cost universal support. BellSouth Telecommunications LLC d/b/a AT&T Alabama ("AT&T") is hereby transmitting information on its plan for the 2020 Connect America Fund Phase II ("CAF II").

As previously indicated in AT&T's correspondence of August 7, 2017, AT&T is currently working to deploy broadband to 80% of the 66,766 of the CAF II living units located within AT&T's service territory by the end of 2019, primarily, if not completely, via a fixed wireless platform.

AT&T is hereby providing information in Attachment "A" to meet Commission requirements set forth in the docket referenced above, as well as FCC requirements. Specifically, Attachment A sets forth AT&T's CAF II plans to deploy the fixed wireless platform to an additional 20% of living units in 2020.

AT&T appreciates the Commission's support of AT&T's network improvement plans over the past years. Please contact us with any questions concerning AT&T's 2020 CAF II plans.

Sincerely yours,

  
Thomas B. Alexander

TBA/mhs  
Attachment

cc: Hon. John Garner, Chief ALJ  
Darrell A. Baker, Director (via email)

1188701

## **ATTACHMENT A**

### **ALABAMA YEAR 2020 CAF FUNDING UTILIZATION BROADBAND INVESTMENTS**

#### **I. Broadband deployment and maintenance in substantially unserved areas: Year 2019**

On May 29, 2015, the FCC offered AT&T Alabama approximately \$23.2M in annual Connect America Fund, Phase II (CAF II), funding support for 6 years, with an option for a 7<sup>th</sup> year of funding, to deploy qualifying broadband service in areas identified by the FCC's Connect America Cost Model (CAM). On August 27, 2015 AT&T accepted this offer. Under this offer, AT&T will deploy broadband services to approximately 66,766 living units in areas identified by the FCC.

Work is currently underway to deploy broadband to 80% of the 66,766 CAF II living units in Alabama by the end of 2019 and will deploy to an additional 20% in 2020.

Until recently, all eligible telecommunications carriers (ETC's) requesting federal high-cost or low-income universal service support were required to file annually with the Universal Service Administrative Company (USAC), financial and operations information using Form 481. In the past, AT&T provided the FCC Form 481 to this Commission. The Commission's Order under this Docket, dated October 25, 2017, requires ETC's to submit to the Commission a duplicate copy of their USAC filing. However, pursuant to its Order for *WC Docket Nos. 10-90 and 14-58 adopted July 6, 2017*, the FCC eliminated the requirement that ETCs submit a duplicate copy of the Form to state commissions contingent upon USAC developing a web portal giving state commissions the capability to download the information. That online portal is now operational. Therefore, the Further Order entered today, July 10, 2018, by this Commission, eliminates the duplicate submission requirement from the Commission's October 25, 2017 Order.

Windstream Communications, Inc.  
4001 Rodney Parham Road  
1170 - B1F2-12A  
Little Rock, AR 72212



June 18, 2019

The Honorable Walter Thomas  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

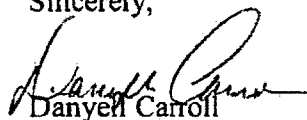
**RE: APSC Certification of Eligibility to Receive High Cost Support  
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980**

Dear Mr. Thomas:

In conjunction with the Commission's annual certification requirements, please find attached an original and one copy of an affidavit filed on behalf of Windstream Alabama, L.L.C. This affidavit certifies that Windstream Alabama, L.L.C. is eligible to receive federal high cost support for high-cost universal service support.

Please contact me at the phone number below with questions regarding this filing.

Sincerely,



Danyell Carroll

Consultant - Regulatory Compliance  
(501) 748-6546

**AFFIDAVIT**

STATE OF ARKANSAS        )

)

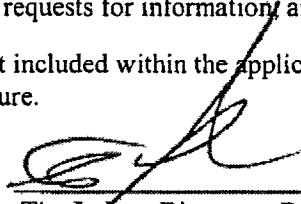
COUNTY OF Pulaski        )

I, Tim Loken, being duly sworn upon oath, do hereby depose and state as follows:

I am the Director - Regulatory Reporting of Windstream Alabama, L.L.C. My business address is 4001 N. Rodney Parham Rd., Little Rock, AR 72212. I am authorized by Windstream Alabama, L.L.C. to make this Affidavit on its behalf, and it is given upon my personal knowledge. This Affidavit is given in support of the Company's Application for Designation as an Eligible Telecommunications Carrier ("ETC") in Docket No. 25980.

On Behalf of Windstream Alabama, L.L.C., I declare the following:

- (1) I fully understand the Federal Communications Commission's ("FCC") rules for ETC qualification and will abide by them;
- (2) I fully understand and will comply with the FCC's rules requiring that the Company provide service through its own facilities or a combination of its own facilities and resale of another carrier's services;
- (3) Regarding Local Exchange Carrier (LEC) from which the Company acquires UNEs and/or resale facilities in Alabama, Windstream Alabama, L.L.C. consents to their releasing to the Alabama Public Service Commission ("Commission") any information the Commission requests for purposes of ensuring future compliance with FCC rules, provided the Commission treats the released information as proprietary, and provided the Commission notifies the Company of any such requests for information; and
- (4) The aforesaid consent supersedes any statement included within the applicable interconnection agreement(s) regarding disclosure.

  
\_\_\_\_\_  
Tim Loken, Director - Regulatory Reporting  
Windstream Alabama, L.L.C.

Subscribed and sworn to before me this 18<sup>th</sup> day of June, 2019

My Commission expires:

August 2, 2020



Sandra Blade  
\_\_\_\_\_  
Notary Public



4001 Rodney Parham Drive • Little Rock, Arkansas 72212  
(501) 748-7000

**Tim Loken, Director**  
Regulatory Reporting  
[Tim.p.loken@windstream.com](mailto:Tim.p.loken@windstream.com)  
(501) 748-7442 (work)  
(501) 748-6583 (fax)

September 26, 2019

**Via Electronic Filing and Overnight Mail**

Honorable Walter Thomas, Secretary  
Alabama Public Service Commission  
100 N. Union Street-8th Floor  
Montgomery, AL 36104

**RE: Implementation of the Universal Service Requirements of Section 254 of the  
Telecommunications Act of 1996 (Certification of Non-Rural Carriers Receiving  
Federal High-Cost Support)  
Docket No. 25980**

Dear Mr. Thomas:

Pursuant to the Alabama Public Service Commission's Order entered in this case on September 27, 2016, Eligible Telecommunications Carriers ("ETCs") in Alabama were ordered to file their proposals for utilization of projected federal high-cost universal support. Windstream Alabama, LLC ("Windstream") is hereby transmitting information on its plan for the 2020 Connect America Fund ("CAF").

Windstream is currently meeting all its obligations in the deployment of the CAF II locations. Windstream is providing information included in Attachment A as required from Docket No. 25980.

Please let me know if you have any questions or if you would like to discuss.

Sincerely,  
  
Tim Loken

Attachment

Cc: Hon. John Garner, Chief ALD  
Darrell A. Baker, Director (email)  
Mac McArthur (email)

## **ATTACHMENT A**

### **ALABAMA YEAR 2020 CAF FUNDING UTILIZATION BROADBAND INVESTMENTS**

#### **Broadband deployment and maintenance in substantially unserved areas: Year 2020**

On May 29, 2015, the FCC offered Windstream Alabama, LLC (Windstream) approximately \$6.1M in Connect America Fund, Phase II (CAF II). Including a phasedown from Windstream's pre-CAF II support amounts, Windstream's support for 2020 is projected at \$511,000.

By accepting the CAF II offer, Windstream agreed to provide qualifying broadband services to 1,889 locations identified by the FCC.

Windstream provided broadband with speeds of at least 10Mb/1Mb to 280 eligible locations during 2018. As of the date of this filing, Windstream provided broadband to 2,737 locations in excess of the required 1,889 locations identified by the FCC as required by the CAF II program. In addition, Windstream was able to provide some of these locations in excess of the minimum 10/1 Mb speeds as follows: 45% at 10Mb, 31% between 12Mb-25Mb, 10% at 100Mb, 14% at 1Gig.



350 S. Loop 336 W., Conroe, TX 77304 | consolidated.com | NASDAQ: CNSL

July 29, 2019

Secretary  
Alabama Public Service Commission  
P. O. Box 991  
Montgomery, Alabama 36101-099

Re: Consolidated Communications of Florida Company – compliance with 47 CFR  
§54.314

Dear Secretary:

Consolidated Communications of Florida Company hereby submits its certified affidavit in support of its use of federal universal service funds and to facilitate certification by the Alabama Public Service Commission to the Federal Communications Commission as contemplated in 47 C.F.R. §54.314.

Please feel free to contact me with any questions concerning this filing at the number below or via email at [beth.westman@consolidated.com](mailto:beth.westman@consolidated.com).

Sincerely,

A handwritten signature in cursive script that reads "Beth Westman".

Beth Westman  
Regulatory Analyst II  
Consolidated Communications  
207-535-4249

AFFIDAVIT

STATE OF MAINE  
COUNTY OF CUMBERLAND

BEFORE ME, the undersigned authority, appeared Michael T. Skrivan, who deposed and said:

My name is Michael T. Skrivan. I am employed by Consolidated Communications of Florida Company, as its Vice President of Regulatory. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Alabama Public Service Commission's certification as contemplated in 47 C.F.R. '54.314.

Consolidated Communications of Florida Company hereby certifies that the federal high-cost universal service support the Company received in 2018 and will receive in 2020 was and will be used for the services and functionalities outlined in 47 C.F.R. §54.101 (a), and that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with section 254( e) of the Act.

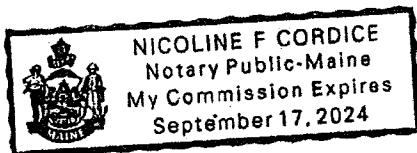
FURTHER AFFIANT SAYETH NOT.

Michael T. Skrivan

Michael T. Skrivan  
Vice President of Regulatory  
GTC, Inc. d/b/a Consolidated Communications

Subscribed and sworn to before me this 11<sup>th</sup> day of July, 2019

Nicoline F Cordice  
Notary

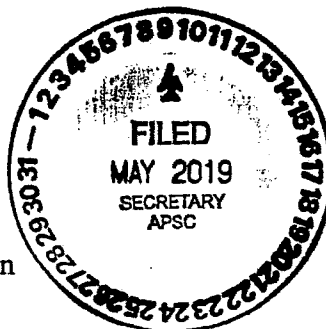






May 7, 2019

The Honorable Walter Thomas  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104



**RE: APSC Certification of Eligibility to Receive High Cost Support  
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980.**

Dear Mr. Thomas:

Please find attached the certification on behalf of Frontier Communications of the South, LLC<sup>1</sup> (the "Company"), in conjunction with the Commission's annual certification that the Company is eligible to continue to receive federal high cost support for high-cost universal service support. If any additional information is required, please contact me at (916) 686-3588 or by email at [joe.chicoine@ftr.com](mailto:joe.chicoine@ftr.com).

Very truly yours,

A handwritten signature in black ink, appearing to read "Joe Chicoine".

Joe Chicoine  
Sr. Manager, Regulatory Affairs  
Frontier Communications

Enclosure

cc: Tom Jones  
A. McCall, Frontier

---

<sup>1</sup> Frontier Communications of Alabama, LLC and Frontier Communications of Lamar County, LLC merged into Frontier Communications of the South, LLC effective January 1, 2018. Refer to Post-Transaction Notification in accordance with Rule T-13, dated January 8, 2018.

## CERTIFICATION

In its December 20, 2001 and September 28, 2005 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and each of the "rural LEC Average Schedule Companies" to file with the Commission a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review.

Due to changes adopted in the FCC's comprehensive order released November 18, 2011<sup>[1]</sup>, price cap carriers are no longer required to perform cost studies for the purpose of calculating high-cost loop support and local switching support. Frontier did not submit a 2018 USF Data Collection Form for Frontier Communications of the South, LLC<sup>2</sup> to NECA.

The Company certifies that it will only use the federal high-cost support it receives during 2019-2020 for the continued provision, maintenance and upgrading of facilities and service for which such support is intended as described in 47 C.F.R. Section 54.101. Those services, which are available to any customer in the Company's service area are: single-party voice grade access to the public switched network, unlimited local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 9-1-1 service or enhanced 9-1-1 service, access to operator service, access to interexchange service, and access to directory assistance, and toll limitation for qualifying low-income customers.

The Company respectfully requests that the Commission notify the FCC prior to October 1 of this year that the Company is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to Cassandra Guinness at 585-777-4557.

Respectfully Submitted,



By: Allison M. Ellis  
Vice President, Regulatory Affairs  
Frontier Communications of the South, LLC

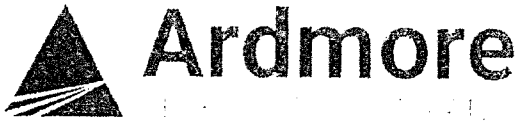
Date: May 7, 2019

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<sup>[1]</sup> See Connect America Fund, et al, W.C. Docket No. 10-90 et al, Report and Order and Further Notice of Proposed Rulemaking "FCC 11-161" (Rel. November 18, 2011).

<sup>[2]</sup> Frontier Communications of Alabama, LLC and Frontier Communications of Lamar County, LLC merged into Frontier Communications of the South, LLC effective January 1, 2018. See Post-Transaction Notification in accordance with Rule T-13, dated January 8, 2018.

Appendix C



100 WK&T Technology Drive  
Mayfield, KY 42066  
256-423-2131 • 800-830-9946  
[www.ardmore.net](http://www.ardmore.net)

July 29, 2019

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

RE: Annual USF Certification Filing

Dear Mr. Thomas:

Attached is Ardmore Telephone Company's (Study Area Code 290280) 2019 Annual State Certification of Support for Eligible Telecommunications Carriers Pursuant to C.F.R. § 54.314. These support funds were used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

If you have any questions, please contact me directly.

Sincerely,

Tiffany Myers  
Chief Financial Officer  
270.804.4110  
[tmyers@mywkt.coop](mailto:tmyers@mywkt.coop)

*Ardmore Telephone is an equal opportunity provider and employer.*

Certification of Ardmore Telephone Company, Inc.

AFFIDAVIT

I, Tiffany Myers, Chief Financial Officer (CFO) of the Ardmore Telephone Company, Inc. hereby certify under penalties of perjury that:

1 My name is Tiffany Myers and I am the Chief Financial Officer (CFO) of Ardmore Telephone Company, Inc. (Company). In this position, I am personally familiar with the Federal Universal Service support received by the Company and how the Company uses these funds.


2 Ardmore Telephone Company (AL-Study Area 290280) has been designated as an (ETC) eligible telecommunications carrier by the Alabama Public Service Commission.

3 The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37);

4 All Federal high-cost Universal Service support provided to the Company was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, as designated by the Federal Communications Commission consistent with Section 254 (e) of the Federal Telecommunications Act. These funds will be used to provide the supported service -voice telephony service as outlined in 47CFR 54.101 (a), which are available to any customer in the Company's service area. This supported service includes: voice grade access to the public switched network; minutes of use for local service provided at no additional charge; access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in the Company's service area has implemented 911 or enhanced 911 systems.

5 Ardmore Telephone Company follows Federal Communications Commission Part 32 accounting requirements for regulated local exchange carriers and Part 36 separations provisions used to determine high cost support amounts. As a regulated utility, Ardmore Telephone Company's accounting and separations procedures are subject to periodic National Exchange Carrier Association and Alabama Public Service Commission reviews.

The matters addressed above are within my personal knowledge and are true and correct.

Signature:   
Print Name: Tiffany Myers  
Title: Chief Financial Officer

Date: 7-29-19

BEFORE ME, the undersigned Notary in and for the State of Ky, on  
this day personally appeared Tiffany Myers, known to me to be the Declarant, who,  
being duly sworn, executed the foregoing instrument.

Subscribed and sworn to before me this 29th day of July, 2019,

My Commission expires 3/23/22.

Stacy A. Wray  
Notary Public #597919



June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Blountsville Telephone LLC's Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Blountsville Telephone LLC's ("Blountsville") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Blountsville is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

A handwritten signature in cursive script, reading "Dennis K. Andrews".

Dennis K. Andrews  
Senior Vice President

Enclosure



## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Blountsville Telephone LLC ("Blountsville") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Blountsville further certifies that all federal high-cost support provided to Blountsville was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Blountsville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Blountsville is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

BLOUNTSVILLE TELEPHONE LLC

By:   
Dennis K. Andrews

As Its: Senior Vice President

Date: June 17, 2019



June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Brindlee Mountain Telephone LLC's Certification of Eligibility to Receive  
High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314;  
APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Brindlee Mountain Telephone LLC's ("Brindlee Mountain") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Brindlee Mountain is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dennis K. Andrews", is written over a horizontal line.

Dennis K. Andrews  
Senior Vice President

Enclosure





## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

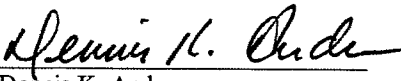
In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

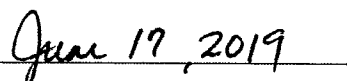
Accordingly, Brindlee Mountain Telephone LLC ("Brindlee Mountain") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Brindlee Mountain further certifies that all federal high-cost support provided to Brindlee Mountain was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Brindlee Mountain respectfully requests that the Commission notify the FCC prior to October 1 of this year that Brindlee Mountain is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

BRINDLEE MOUNTAIN TELEPHONE LLC

By:   
Dennis K. Andrews  
As Its: Senior Vice President

Date: 



June 27, 2019

**VIA ELECTRONIC FILING**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
100 North Union Street, STE 950  
Montgomery, AL 36104

**RE: APSC Certification of Eligibility to Receive High Cost Support  
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980.**

Dear Mr. Thomas:

In conjunction with the Commissioner's annual certification requirements, please find enclosed for electronic filing Butler Telephone Company, Inc., Oakman Telephone Company and Peoples Telephone Company d/b/a TDS Telecom's (the "Companies") certification that the Companies are eligible to continue to receive federal high cost support for high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314 and APSC Docket No. 25980. The original and ten (10) copies will follow via mail.

If additional information is required, please contact me at 850-875-5207.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas McCabe / RL".

Thomas McCabe  
Manager – State Government Affairs

Enclosures

cc: David Peeler



June 27, 2019

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
STE 950  
100 North Union Street  
Montgomery, AL 36104

**RE: TDS Telecom's Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing TDS Telecom's ("TDS") certification, on behalf of its Alabama subsidiaries, Butler Telephone Company, Inc., Oakman Telephone Company, and Peoples Telephone Company, that TDS is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

As required under its September 27, 2016 Order, TDS provided notification to the Commission of its acceptance of Alternative Connect America Cost Model ("A-CAM") funding following the FCC's approval, commencing January 1, 2017. Under A-CAM, TDS has an obligation to deploy and offer broadband to 10,940 locations in Alabama and has already begun deploying facilities to meet the first 40% benchmark of total supported locations by December 21, 2020. TDS will utilize the A-CAM support for the 2020 program year for investment and expenses that may include extension of fiber, deployment and maintenance of broadband capable equipment.

Please be further advised that, in accordance with 47 C.F.R. § 54.313 and the Commission's *Further Report and Order* of September 27, 2016, in Docket No. 25980, TDS has submitted copies of the FCC Form 481 filed with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") for the program year 2020, to the Commission's Utility Services Division under separate cover.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (850) 875-5207.

Very truly yours,

  
Thomas McCabe

Manager State Government Affairs

Enclosure  
cc: David Peeler

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, TDS Telecom ("TDS"), on behalf of its Alabama subsidiaries, Butler Telephone Company, Inc., Oakman Telephone Company, and Peoples Telephone Company, certifies that it has timely filed its Form 481 for the program year 2020 with the FCC and USAC and has provided a courtesy copy of the same to the staff of the Commission's Utility Services Division. TDS further certifies that all federal high-cost support provided to TDS was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

TDS respectfully requests that the Commission notify the FCC prior to October 1 of this year that TDS subsidiaries are eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Tom McCabe at (850) 875-5207.

Respectfully Submitted,

TDS TELECOM, on behalf of its Alabama subsidiaries:

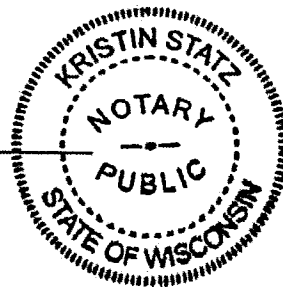
BUTLER TELEPHONE COMPANY, INC.  
OAKMAN TELEPHONE COMPANY  
PEOPLES TELEPHONE COMPANY

By: Joel Dolmeier  
Joel Dolmeier  
Vice President

Subscribed and sworn to before me this 27 day of June, 2019.

Kristin Statz  
Kristin Statz - Notary Public  
My Commission expires May 2, 2023

Date: 6/27/19



# CASTLEBERRY TELEPHONE COMPANY, INC.

P.O. BOX 37  
CASTLEBERRY, ALABAMA 36432  
PHONE 251-966-2110

July 1, 2019

## VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Castleberry Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Castleberry Telephone Company, Inc.'s ("Castleberry") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Castleberry is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (251) 966-2115.

Very truly yours,



Homer Holland  
Secretary/Treasurer

Enclosure

# CASTLEBERRY TELEPHONE COMPANY, INC.

P.O. BOX 37  
CASTLEBERRY, ALABAMA 36432  
PHONE 251-966-2110

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Castleberry Telephone Company, Inc. ("Castleberry") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Castleberry further certifies that all federal high-cost support provided to Castleberry was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Castleberry respectfully requests that the Commission notify the FCC prior to October 1 of this year that Castleberry is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Homer Holland at (251) 966-2115.

Respectfully Submitted,

CASTLEBERRY TELEPHONE COMPANY, INC.

By: Homer Holland  
Homer Holland

As Its: Secretary/Treasurer

Date: \_\_\_\_\_



FARMERS TELECOMMUNICATIONS COOPERATIVE, INC.

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June 19, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Farmers Telecommunications Cooperative, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Farmers Telecommunications Cooperative, Inc.'s ("Farmers") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Farmers is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 638-2144.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Frederick Johnson", is written over the typed name.

J. Frederick Johnson  
Executive Vice President and General Manager

Enclosure





### CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

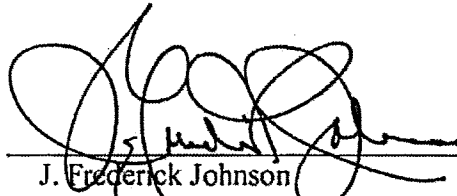
Accordingly, Farmers Telecommunications Cooperative, Inc. ("Farmers") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Farmers further certifies that all federal high-cost support provided to Farmers was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Farmers respectfully requests that the Commission notify the FCC prior to October 1 of this year that Farmers is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 638-2144.

Respectfully Submitted,

FARMERS TELECOMMUNICATIONS  
COOPERATIVE, INC.

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'J. Frederick Johnson', written over a horizontal line.

J. Frederick Johnson

As Its: Executive Vice President and General  
Manager

Date: 06-19-2019



## Hayneville Telephone Company, Inc.

P. O. Box 175 • 210 E Tuskeena Street • Hayneville, Alabama 36040

Phone: (334) 548-2101 • Fax: (334) 548-2051

Local Service, Global Connections

July 1, 2019

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Hayneville Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Hayneville Telephone Company, Inc.'s ("Hayneville") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that, in accordance with 47 C.F.R. § 54.313 and the Commission's *Further Report and Order* of September 27, 2016, in Docket No. 25980, Hayneville has submitted copies of the FCC Form 481 filed with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") for the program year 2019, to the Commission's Utility Services Division under separate cover.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 371-3008.

Very truly yours,

Evelyn P. Causey  
President and Chief Operations Officer

Enclosure

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Hayneville Telephone Company, Inc. ("Hayneville") certifies that it has timely filed its Form 481 for the program year 2020 with the FCC and USAC. Hayneville further certifies that all federal high-cost support provided to Hayneville was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Hayneville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Hayneville is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 371-3008.

Respectfully Submitted,

HAYNEVILLE TELEPHONE COMPANY, INC.

By: Evelyn P. Causey  
Evelyn P. Causey

As Its: President and Chief Operations Officer

Date: 7/5/19



June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Hopper Telecommunications LLC's Certification of Eligibility to Receive  
High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314;  
APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Hopper Telecommunications LLC's ("Hopper") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Hopper is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dennis K. Andrews", is written over a horizontal line.

Dennis K. Andrews  
Senior Vice President

Enclosure



### CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

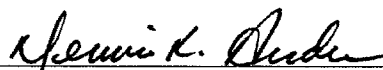
In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Hopper Telecommunications LLC ("Hopper") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Hopper further certifies that all federal high-cost support provided to Hopper was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Hopper respectfully requests that the Commission notify the FCC prior to October 1 of this year that Hopper is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

HOPPER TELECOMMUNICATIONS LLC

By:   
Dennis K. Andrews  
As Its: Senior Vice President

Date: June 17, 2019



June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's ("Knology of the Valley") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Knology of the Valley is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Red 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Arlene Morgan at (706) 645-8116.

Very truly yours,

Arlene Morgan  
Director of Regulatory Finance  
WideOpenWest, parent company of  
Knology of the Valley, Inc.

Enclosure



It's that kind of experience.

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Knology of the Valley, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone ("Knology of the Valley") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Knology of the Valley further certifies that all federal high-cost support provided to Knology of the Valley was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Knology of the Valley respectfully requests that the Commission notify the FCC prior to October 1 of this year that Knology of the Valley is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Arlene Morgan at (706) 645-8116.



Respectfully Submitted,

KNOLOGY OF THE VALLEY, INC. d/b/a  
KNOLOGY or d/b/a WOW! INTERNET, CABLE  
AND PHONE

By: Arlene Morgan  
Arlene Morgan

As Its: Director of Regulatory Finance  
WideOpenWest, parent company of  
Knology of the Valley, Inc.

Date: 6/17/2019



June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's ("Knology Total") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Knology Total is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Arlene Morgan at (706) 645-8116.

Very truly yours,

Arlene Morgan  
Director of Regulatory Finance  
WideOpenWest, parent company of  
Knology Total Communications, Inc.

Enclosure



## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Knology Total Communications, Inc. d/b/a Knology or d/b/a WOW! Internet, Cable and Phone ("Knology Total") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Knology Total further certifies that all federal high-cost support provided to Knology Total was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Knology Total respectfully requests that the Commission notify the FCC prior to October 1 of this year that Knology Total is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Arlene Morgan at (706) 645-8116.

KNOLOGY TOTAL COMMUNICATIONS, INC.  
d/b/a KNOLOGY or d/b/a WOW! INTERNET,  
CABLE AND PHONE

By: Arlene Morgan  
Arlene Morgan

As Its: Director of Regulatory Finance  
WideOpenWest, parent company of  
Knology Total Communications, Inc.

Date: 6/17/2019



MILLRY TELEPHONE COMPANY, INC.

June 28, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Millry Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Millry Telephone Company, Inc.'s ("Millry") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Millry is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Annice Jordan at (251) 846-2911.

Very truly yours,

Paul E. Brown, Jr.  
Vice President

Enclosure

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

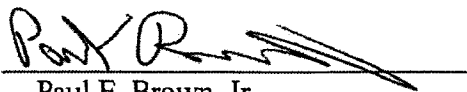
In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Millry Telephone Company, Inc. ("Millry") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Millry further certifies that all federal high-cost support provided to Millry was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Millry respectfully requests that the Commission notify the FCC prior to October 1 of this year that Millry is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Annice Jordan at (251) 846-2911.

Respectfully Submitted,

MILLRY TELEPHONE COMPANY, INC.

By:   
Paul E. Brown, Jr.

As Its: Vice President

Date: 6-28-19



P.O. Box 125  
227 Main St.  
Ramer, AL 36069  
334-562-3242  
mon-cre.net

June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Mon-Cre Telephone Cooperative, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Mon-Cre Telephone Cooperative, Inc.'s ("Mon-Cre") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Mon-Cre is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Teresa Rich at (334) 562-3242.

Very truly yours,

James May  
Vice President

Enclosure



P.O. Box 125  
227 Main St.  
Ramer, AL 36069  
334-562-3242  
mon-cre.net

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Mon-Cre Telephone Cooperative, Inc. ("Mon-Cre") certifies compliance in filing its FCC Form 481 for the program year 2020 as required. Mon-Cre further certifies that all federal high-cost support provided to Mon-Cre was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Mon-Cre respectfully requests that the Commission notify the FCC prior to October 1 of this year that Mon-Cre is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Teresa Rich at (334) 562-3242.



Respectfully Submitted,

MON-CRE TELEPHONE COOPERATIVE, INC.

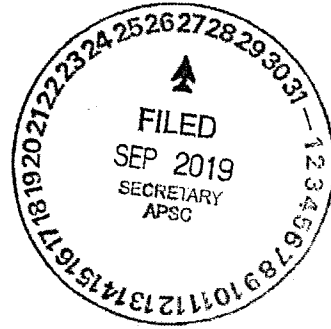
By: James H May  
James May

As Its: Vice President

Date: 6-17-19



September 27, 2019



**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Moundville Telephone Company, Inc.'s Certification of Eligibility  
to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254;  
47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Moundville Telephone Company, Inc.'s ("Moundville") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Moundville is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (205) 371-9011.

Very truly yours,

R. Scott Taylor  
President/General Manager

Enclosure



## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform - Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Moundville Telephone Company, Inc. ("Moundville") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Moundville further certifies that all federal high-cost support provided to Moundville was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Moundville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Moundville is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to me at (205) 371-9011.

Respectfully Submitted,

MOUNDVILLE TELEPHONE COMPANY,  
INC.

By: 

R. Scott Taylor

As Its: President/General Manager

Date: September 27, 2019



# TEC

June 27, 2019

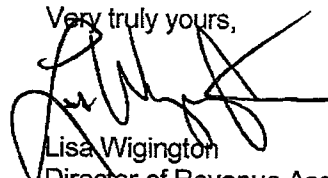
Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: APSC Certification of Eligibility to Receive High Cost Support  
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached the certification of National Telephone of Alabama, Inc. dba Cherokee Telephone Company marketing under TEC (the "Company") that the Company is eligible to continue to receive support from the Connect America Fund ("CAF"). If any additional information is required, please contact me at (601) 354-9070.

Very truly yours,



Lisa Wigington  
Director of Revenue Assurance  
And Regulatory Compliance

Enclosure (1)

A 955 Second Street  
P.O. Box 249  
Cherokee, AL 35616

P 256.359.4321

F 256.359.6410

W [www.tec.com](http://www.tec.com)



## CERTIFICATION

In its December 20, 2001 and September 27, 2011 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and each of the "rural LEC Average Schedule Companies" to file with the Commission a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review. Pursuant to the Order, the Company's requirement to provide the Commission with a copy of its most recent annual interstate cost separation study and estimated 2017-2018 Connect America Fund ("CAF") ICC Support, which includes USF-LSS has been superseded by the requirement to file the attached FCC form 481.

National Telephone of Alabama, Inc. hereby certifies that it has used the federal high-cost support in the preceding calendar year and will use the funds for the upcoming calendar year for the provision, maintenance and upgrading of facilities and service for which such support is intended.

The Company hereby certifies that it has submitted via annual NECA filings, expenditures in support of its universal service filing. USF disbursements received by the Company and other rural incumbent local exchange companies that require state commission certification are divided into **three categories**: High Cost Loop Support ("HCLS"); Safety Net Additive Support ("SNAS"), and the Connect America Fund ("CAF"). The FCC in conjunction with the Federal-State Joint Board on Universal Service has created each of the above mechanisms. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

The Company elected to receive Alternative Connect America Cost Model ("A-CAM") funding beginning in January 2017. This funding was made available by the FCC by WC Docket No. 10-90, Connect America Fund to further the goal of providing robust broadband access throughout the nation. The model support must be elected by state and therefore is distributed to both the Company and its Alabama affiliate Roanoke Telephone Company, Inc. evenly by month, originally over a 10-year period. The total for the two Alabama ILECs amounted to \$1.05 million annually. In May of 2018, the FCC extended a second offer for ACAM participants to fully fund the ACAM model which increased the total 10-year funding to \$1.23 million annually with a true up payable in 2018. In March of 2019, the FCC extended a third offer for ACAM participants to fully fund the ACAM which increased the total funding to \$1.28 million annually with a true up payable in 2019. The March 2019 offer also extended the original 10-year timeframe for an additional 2 years, to December 2028. Electing to receive the A-CAM funding requires that the Company build out cable plant to rural areas to provide a certain level of broadband internet within the funded locations. The Company will still be required to meet the previous buildout obligation for 10/1 Mbps service but accepting the third ACAM offer changed the buildout obligation for 25/3 service. In 2022, the Company must be able to provide 25/3 Mbps service to at least 40% of the requisite number of eligible locations by end of the 2022, 50% by the end of 2023, 60% by the end of 2024, 70% by the end of 2025, 80% by the end of 2026, 90% by the end of 2027, and 100% by the end of 2028.

CAF support in 2018 was \$152,692. The Company further certifies that it will only use the CAF ICC Support it receives during 2018-2019 for the provision, maintenance and upgrading of facilities and service for which such support is intended as described in 47 C.F.R. § 54.101. Those services, which are available to any customer in the Company's service area are: single-party voice grade access to the public switched network, unlimited local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 9-1-1 service or enhanced 9-1-1 service, access to operator service, access to interexchange service, and access to directory assistance, and toll limitation for qualifying low-income customers.

All of these programs are administered through USAC, a private, not-for-profit corporation. USAC assists NECA in data collection necessary for the remittance of universal service funds. This means each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process necessary for the remittance of universal service funds.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

On March 1, 2019 National Telephone of Alabama, Inc. exited the NECA Traffic Sensitive Pool effective July 2, 2019. The Company will become an issuing carrier under the John Staurulakis, Inc. (JSI) Tariff. The Company will be required to establish traffic sensitive switched access rates in compliance with the FCC Part 51, Subpart J Transitional Access Pricing rules. As a result of this change all of the Company's interstate revenues will be transitioned to "bill & keep". Also, this change will give the Company greater pricing flexibility to respond to competitive pressures. These changes will allow the Company to be competitive in the market but the Universal Service Administrative Co. ("USAC") ensures that the tariff changes do not affect high cost support obligations. To ensure the highest level of program integrity USAC conducts audits of beneficiaries of USF disbursements. USAC operates the Beneficiary and Contributor Audit Program ("BCAP") and Payment Quality Assurance Program ("PQA").

All cost studies submitted by rural ILECs and all USF funding received by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify to the accuracy and validity of the filed information.

Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to James Garner at (601) 354-9070.

Respectfully Submitted,

NATIONAL TELEPHONE OF ALABAMA, INC.

By: 

James Garner

As Its: Vice President of Operations

Date: June 27, 2019

# New Hope

Telephone  
Cooperative

Your Broadband Connection

July 1, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: New Hope Telephone Cooperative, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing New Hope Telephone Cooperative, Inc.'s ("New Hope") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that New Hope is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 723-4211.

Very truly yours,



Daniel Martin  
General Manager

Enclosure



# New Hope

Telephone  
Cooperative

Your Broadband Connection

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, New Hope Telephone Cooperative, Inc. ("New Hope") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. New Hope further certifies that all federal high-cost support provided to New Hope was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

New Hope respectfully requests that the Commission notify the FCC prior to October 1 of this year that New Hope is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Daniel Martin at (256) 723-4211.

Respectfully Submitted,  
NEW HOPE TELEPHONE COOPERATIVE, INC.

By: 

Daniel Martin

As Its: General Manager



June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Otelco Telephone, LLC's Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Otelco Telephone, LLC's ("Otelco") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Otelco is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (256) 586-1420.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Dennis K. Andrews'.

Dennis K. Andrews  
Senior Vice President

Enclosure



## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

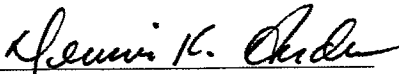
In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Otelco Telephone, LLC ("Otelco") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Otelco further certifies that all federal high-cost support provided to Otelco was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Otelco respectfully requests that the Commission notify the FCC prior to October 1 of this year that Otelco is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (256) 586-1420.

Respectfully Submitted,

OTELCO TELEPHONE, LLC

By:   
Dennis K. Andrews

As Its: Senior Vice President

Date: June 17, 2019



June 21, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Pine Belt Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

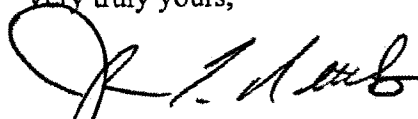
Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Pine Belt Telephone Company, Inc.'s ("Pine Belt") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Pine Belt is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 385-2106.

Very truly yours,



John C. Nettles  
President

Enclosure



## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Pine Belt Telephone Company, Inc. ("Pine Belt") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Pine Belt further certifies that all federal high-cost support provided to Pine Belt was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Pine Belt respectfully requests that the Commission notify the FCC prior to October 1 of this year that Pine Belt is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 385-2106.

Respectfully Submitted,

PINE BELT TELEPHONE COMPANY, INC.

By: 

John C. Nettles

As Its: President

Date: 6/21/2019

MATTHEW JACKSON  
PRESIDENT

TIM FORD  
SECRETARY



STEPHANIE JACKSON  
VICE PRESIDENT

DOYLE KAY  
PLANT SUPERVISOR

## Ragland Telephone Co., Inc.

POST OFFICE BOX 577  
RAGLAND, ALABAMA 35131  
205-472-2141  
FAX 205-472-2145  
June 28, 2019

### VIA HAND DELIVERY

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Ragland Telephone Company, Inc.'s Certification of Eligibility to Receive  
High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314;  
APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Ragland Telephone Company, Inc.'s ("Ragland") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Ragland is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Rod Ballard at Jackson Thornton & Co., P.C. at (334) 240-3622.

Very truly yours,

Matthew Jackson  
President

Enclosure

MATTHEW JACKSON  
PRESIDENT

TIM FORD  
SECRETARY



STEPHANIE JACKSON  
VICE PRESIDENT

DOYLE KAY  
PLANT SUPERVISOR

## Ragland Telephone Co., Inc.

POST OFFICE BOX 577  
RAGLAND, ALABAMA 35131  
205-472-2141  
FAX 205-472-2145

### CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Ragland Telephone Company, Inc. ("Ragland") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Ragland further certifies that all federal high-cost support provided to Ragland was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Ragland respectfully requests that the Commission notify the FCC prior to October 1 of this year that Ragland is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Rich Compton at Jackson Thornton & Co., P.C. at (334) 240-3684.

Respectfully Submitted,

RAGLAND TELEPHONE COMPANY, INC.

By: 

Matthew Jackson

As Its: President

Date: 06.28.2019





# TEC

June 27, 2019

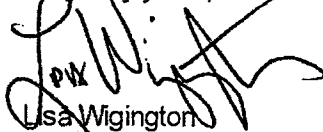
Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: APSC Certification of Eligibility to Receive High Cost Support  
Pursuant to 47 C.F.R. §54.314; APSC Docket 25980**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached the certification of Roanoke Telephone Company, Inc. marketing under TEC (the "Company") that the Company is eligible to continue to receive support from the Connect America Fund ("CAF"). If any additional information is required, please contact me at (601) 354-9070.

Very truly yours,



Lisa Wigington  
Director of Revenue Assurance  
and Regulatory Compliance

Enclosure (1)



## CERTIFICATION

In its December 20, 2001, and September 27, 2011 Orders in APSC Docket 25980, this Commission determined that it could best meet its monitoring and certification obligations by requiring the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review and each of the "rural LEC Average Schedule Companies" to file with the Commission a copy of NECA's proposed annual USF-HCLS and USF-LSS amounts for review. Pursuant to the Order, the Company's requirement to provide the Commission with a copy of its most recent annual interstate cost separation study and estimated 2017-2018 Connect America Fund ("CAF") ICC Support, which includes USF-LSS has been superseded by the requirement to file the attached FCC form 481.

Roanoke Telephone Company, Inc. hereby certifies that it has used the federal high-cost support in the preceding calendar year and will use the funds for the upcoming calendar year for the provision, maintenance and upgrading of facilities and service for which such support is intended.

The Company hereby certifies that it has submitted via annual NECA filings, expenditures in support of its universal service filing. USF disbursements received by the Company and other rural incumbent local exchange companies that require state commission certification are divided into **three categories**: High Cost Loop Support ("HCLS"); Safety Net Additive Support ("SNAS"), and the Connect America Fund ("CAF"). The FCC in conjunction with the Federal-State Joint Board on Universal Service has created each of the above mechanisms. This means that representatives from State Commissions have also been involved in the development of these mechanisms through their representation in the Joint Board process.

The Company elected to receive Alternative Connect America Cost Model ("A-CAM") funding beginning in January 2017. This funding was made available by the FCC by WC Docket No. 10-90, Connect America Fund to further the goal of providing robust broadband access throughout the nation. The model support must be elected by state and therefore is distributed to both the Company and its Alabama affiliate National Telephone of Alabama, Inc. evenly by month, originally over a 10-year period. The total for the two Alabama ILECs amounted to \$1.05 million annually. In May of 2018, the FCC extended a second offer for ACAM participants to fully fund the ACAM model which increased the total 10-year funding to \$1.23 million annually with a true up payable in 2018. In March of 2019, the FCC extended a third offer for ACAM participants to fully fund the ACAM which increased the total funding to \$1.28 million annually with a true up payable in 2019. The March 2019 offer also extended the original 10-year timeframe for an additional 2 years, to December 2028. Electing to receive the A-CAM funding requires that the Company build out cable plant to rural areas to provide a certain level of broadband internet within the funded locations. The Company will still be required to meet the previous buildout obligation for 10/1 Mbps service but accepting the third ACAM offer changed the buildout obligation for 25/3 service. In 2022, the Company must be able to provide 25/3 Mbps service to at least 40% of the requisite number of eligible locations by end of the 2022, 50% by the end of 2023, 60% by the end of 2024, 70% by the end of 2025, 80% by the end of 2026, 90% by the end of 2027, and 100% by the end of 2028.

CAF support in 2018 was \$204,780. The Company further certifies that it will only use the CAF ICC Support it receives during 2018-2019 for the provision, maintenance and upgrading of facilities and service for which such support is intended as described in 47 C.F.R. § 54.101. Those services, which are available to any customer in the Company's service area are: single-party voice grade access to the public switched network, unlimited local usage, dual-tone multi-frequency signaling or its functional equivalent, access to emergency services, including 9-1-1 service or enhanced 9-1-1 service, access to operator service, access to interexchange service, and access to directory assistance, and toll limitation for qualifying low-income customers.

All of these programs are administered through USAC, a private, not-for-profit corporation. USAC assists NECA in data collection necessary for the remittance of universal service funds. This means each company submits, no less frequently than annually, detailed information requested by NECA in the USF data collection process necessary for the remittance of universal service funds.

Rural ILECs must attest to the information submitted. Further, NECA and its auditors must attest to the validity and integrity of NECA's process. In other words, the ILEC cost studies and responses to data collection requests are subject to audit. The information provided in response to all of the universal service fund mechanisms utilizes FCC accounts for regulated costs and must be in compliance with FCC rules in Parts 32, 36, 54 and 64.

On March 1, 2019 Roanoke Telephone Company, Inc. exited the NECA Traffic Sensitive Pool effective July 2, 2019. The Company will become an issuing carrier under the John Staurulakis, Inc. (JSI) Tariff. The Company will be required to establish traffic sensitive switched access rates in compliance with the FCC Part 51, Subpart J Transitional Access Pricing rules. As a result of this change all of the Company's interstate revenues will be transitioned to "bill & keep". Also, this change will give the Company greater pricing flexibility to respond to competitive pressures. These changes will allow the Company to be competitive in the market but the Universal Service Administrative Co. ("USAC") ensures that the tariff changes do not affect high cost support obligations. To ensure the highest level of program integrity USAC conducts audits of beneficiaries of USF disbursements. USAC operates the Beneficiary and Contributor Audit Program ("BCAP") and Payment Quality Assurance Program ("PQA").

All cost studies submitted by rural ILECs and all USF funding received by rural ILECs must be based upon financial statements. In addition, NECA performs focus reviews of cost studies as well as the USF filings for the cost companies involved in the NECA process. In addition, an officer of the rural ILEC must certify to the accuracy and validity of the filed information.

Any questions regarding this submission or the underlying documentation previously submitted to the Commission should be directed to James Garner at (601) 354-9070.

Respectfully Submitted,

ROANOKE TELEPHONE COMPANY, INC.

By: 

James Garner

As its: Vice President of Operations

Date: June 27, 2019



## UNION SPRINGS TELEPHONE COMPANY

P. O. BOX 272, UNION SPRINGS, ALABAMA 36089

PHONE (334) 738-4400 FAX (334) 738-5555

June 25, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Union Springs Telephone Company, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**


Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Union Springs Telephone Company, Inc.'s ("Union Springs") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that Union Springs is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 738-4400.

Very truly yours,

  
William H. Freeman  
President

Enclosure



## UNION SPRINGS TELEPHONE COMPANY

P. O. BOX 272, UNION SPRINGS, ALABAMA 36089

PHONE (334) 738-4400 FAX (334) 738-5555

### CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Union Springs Telephone Company, Inc. ("Union Springs") certifies compliance in filing its FCC Form 481 for the program year 2020 as required. Union Springs further certifies that all federal high-cost support provided to Union Springs was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Union Springs respectfully requests that the Commission notify the FCC prior to October 1 of this year that Union Springs is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 738-4400.

Respectfully Submitted,

UNION SPRINGS TELEPHONE COMPANY,  
INC.

By: W+H Freeman  
William H. Freeman  
As Its: President

Date: 6-25-2019

# WOW!



It's that kind of experience.

June 17, 2019

**VIA HAND DELIVERY**

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Valley Telephone Co., LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Valley Telephone Co., LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone's ("Valley") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy of this filing will be delivered to the Commission.

Please be further advised that Valley is in compliance with all applicable requirements for filing the FCC Form 481 for the program year 2020, as set forth in *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order, 32 FCC Rcd 5944 (2017) ("*ETC Reporting Streamlining Order*") and *In the Matter of Connect America Fund*, Order, WC Docket 10-90 (DA 18-585) (June 6, 2018), and with this Commission's Orders in Docket No. 25980.

Should you have any questions regarding this matter, or if any additional information is required, please contact Arlene Morgan at (706) 645-8116.

Very truly yours,

Arlene Morgan  
Director of Regulatory Finance  
WideOpenWest, parent company of  
Valley Telephone Co., LLC

Enclosure



It's that kind of experience.

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Valley Telephone Co., LLC d/b/a Knology or d/b/a WOW! Internet, Cable and Phone ("Valley") certifies its compliance in filing its FCC Form 481 for the program year 2020 as required. Valley further certifies that all federal high-cost support provided to Valley was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Valley respectfully requests that the Commission notify the FCC prior to October 1 of this year that Valley is eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to Arlene Morgan at (706) 645-8116.



Respectfully Submitted,

VALLEY TELEPHONE CO., LLC d/b/a  
KNOLOGY or d/b/a WOW! INTERNET, CABLE  
AND PHONE

By: Arlene Morgan  
Arlene Morgan

As Its: Director of Regulatory Finance  
WideOpenWest, parent company of  
Valley Telephone Co., LLC

Date: 6/17/2019

Appendix D

Hayneville Fiber Transport, Inc. d/b/a

Post Office Box 129  
180 Greenville Bypass  
Greenville, AL 36037

**Camellia**  
COMMUNICATIONS

Greenville: 334-371-3000  
Fort Deposit: 334-404-4000  
Fax: 334-371-3001

*Local Service, Long Distance, Internet/DSL*

July 1, 2019

Honorable Walter L. Thomas, Jr., Secretary  
Alabama Public Service Commission  
RSA Union Building  
100 North Union Street  
Montgomery, AL 36104

**RE: Hayneville Fiber Transport, Inc.'s Certification of Eligibility to Receive High Cost Support for 2020 Pursuant to 47 U.S.C. § 254; 47 C.F.R. § 54.314; APSC Docket 25980; FCC WC Docket No. 14-58**

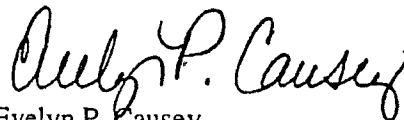
Dear Mr. Thomas:

In conjunction with the Alabama Public Service Commission's (the "Commission") annual certification requirements, please find attached for electronic filing Hayneville Fiber Transport, Inc.'s ("Camellia") certification that it is eligible to continue to receive federal high-cost universal service support for the year 2020, in accordance with the requirements of Section 254 of the Telecommunications Act of 1996, 47 C.F.R. § 54.314, APSC Docket No. 25980 and FCC WC Docket No. 14-58. The original and one copy will be delivered to the Commission.

Please be further advised that, in accordance with 47 C.F.R. § 54.313 and the Commission's *Further Report and Order* of September 27, 2016, in Docket No. 25980, Camellia has submitted copies of the FCC Form 481 filed with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") for the program year 2018, to the Commission's Utility Services Division under separate cover.

Should you have any questions regarding this matter, or if any additional information is required, please contact me at (334) 371-3008.

Very truly yours,



Evelyn P. Causey  
President and Chief Operations Officer

Enclosure

## CERTIFICATION

In its September 27, 2016 Order in APSC Docket 25980, this Commission undertook substantial revisions to its previous order of December 20, 2001, in this same docket, which required the "rural LEC Cost Companies" to file with the Commission a copy of their supporting annual interstate cost separation study, annual USF-HCLS filing and estimated USF-LSS filing for review, and the "rural LEC Average Schedule Companies" to file a copy of the Universal Service Administrative Company's ("USAC") and the National Exchange Carriers Association's ("NECA") proposed annual USF-HCLS and USF-LSS amounts for review.

In particular, this Commission found that the provisions of the Federal Communications Commission's ("FCC") Connect America Fund Order (*Report and Order and Further Notice of Proposed Rulemaking, Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208; and FCC 11-161, rel. Nov. 18, 2011) supersede and replace the requirements applicable to previous high-cost funding mechanisms. Eligible telecommunications carriers ("ETCs") now receive high-cost support that includes local switching support, and the FCC has implemented extensive reporting requirements for recipients of these funds. Because of these changes, the Commission found that it can adequately assess the Rural LECs' compliance with these federal reporting requirements based on a review of the annual FCC Form 481s submitted by the Rural LECs.

Accordingly, Hayneville Fiber Transport, Inc. ("Camellia") certifies that it has timely filed its Form 481 for the program year 2020 with the FCC and USAC. Camellia further certifies that all federal high-cost support provided to Camellia was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with Section 254 of the Telecommunications Act of 1996.

Hayneville respectfully requests that the Commission notify the FCC prior to October 1 of this year that Camellias eligible to receive federal high-cost support in 2020. Any questions regarding this submission or the underlying documentation submitted to the Commission should be directed to the undersigned at (334) 371-3008.

Respectfully Submitted,

HAYNEVILLE FIBER TRANSPORT, INC.

By: Evelyn P. Causey  
Evelyn P. Causey

As Its: President and Chief Operations Officer

Date: 7/5/19



May 31, 2019

Hon. Walter L. Thomas, Secretary  
Alabama Public Service Commission  
100 North Union Street  
RSA Union Building, Suite 850  
Montgomery, AL 36130

Re: Docket No. 29540 Certification of Eligibility of Troy Cablevision, Inc. to Receive Federal Universal Service Funds (FUSF) in Study Area 259025 as it applies to the first through Fourth Quarters of 2020.

Troy Cablevision, Inc. ("Company") hereby provides the required certification and requested information regarding the use of support funds to be received in 2020 and the use of funds received in 2018.

On behalf of the Company, I, William H. Freeman, an officer of the Company with substantial knowledge of the Company's operations, do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

1. I am President of Troy Cablevision, Inc.
2. The company is certified as a Competitive Eligible Telecommunications Carrier ("ETC") in the exchanges of ETC certified non-rural Incumbent LECs, BellSouth Telecommunications, Inc. d/b/a AT&T Alabama; CenturyTel of Alabama, LLC; and Butler Telephone Company;
3. As such, the Company is eligible to receive phased down disbursements from the federal Universal Service Fund in a manner and amount equal to the disbursements received by BellSouth Telecommunications, Inc. d/b/a AT&T Alabama; CenturyTel of Alabama, LLC; and Butler Telephone Company as prescribed by the Federal Communications Commission.
4. For funds received in 2018, the Company has utilize all federal High Cost Support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 U.S.C. § 54.314 of the Telecommunications Act of 1996.
5. For funds received in 2020, the Company will utilize all federal High Cost Support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 U.S.C. § 54.314 of the Telecommunications Act of 1996.

Respectfully Submitted,

William H. Freeman  
President